

**Barnes, Robin**

---

**From:** Garner, Mike (ECY) [JAMG461@ECY.WA.GOV]  
**Sent:** Wednesday, July 01, 2009 5:06 PM  
**To:** Dembek, Stephen  
**Cc:** Owens, Janice; Barnes, Robin; Mitchell, Kristen (ATG); Blado, Alice (ATG)  
**Subject:** Northwest Compact Response to AREVA Import (IW009/02) and Export (XW015) License Applications  
**Attachments:** 20090701134622741.pdf

Steve: Attached is the Northwest Compact's response to AREVA's import (IW009/02) and export (XW015) license applications. Please let me know if you want the original mailed to you. Hope things are going well –  
Mike

**Northwest Interstate Compact**

**On Low-Level Radioactive Waste Management**

P.O. Box 47600. Olympia, Washington 98504-7600. (360) 407-7102. Mike Garner, Executive Director

---

July 1, 2009

Mr. Stephen Dembek, Branch Chief  
Export Controls and International Organizations  
Office of International Programs  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

RE: Application for NRC Import License (IW009/02) and Export License (XW015)

Dear Mr. Dembek:

Thank you for your June 15, 2009 letter requesting comments on the import (IW009/02) and export (XW015) licenses being sought by AREVA NP Inc. The import license application will extend the expiration date of the current import license (IW009/01) from December 31, 2010 to December 31, 2020. This will enable AREVA to continue to import contaminated combustible materials from AREVA Nuclear Fuels in Germany to the AREVA facility in Richland, Washington for uranium recovery. The export license (XW015) allows AREVA's Richland facility to return all contaminated non-combustible materials included in shipments to AREVA Nuclear Fuels in Germany.

The Northwest Compact has no issues with the requested license applications provided that two conditions are met to ensure no orphan radioactive waste result from the request. First, the U.S. Nuclear Regulatory Commission approves the export license that allows contaminated non-combustible materials to be returned to AREVA's Germany facility. This will ensure that there is no orphan low-level waste. All low-level radioactive waste resulting from the uranium recovery process is eligible for disposal at the commercial low-level waste facility operated by US Ecology Washington, Inc. in Richland, Washington. Second, the state of Utah authorizes EnergySolutions to accept any low-level radioactive mixed waste that results from the uranium recovery project.

Should you have additional questions please contact me at (360) 407-7102.

Sincerely,



Mike Garner, Executive Director  
Northwest Interstate Compact

cc: Northwest Compact Committee